



Diverse Radio for Minnesota's Communities

August 26, 2014

Chairman Tom Wheeler
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Chairman Wheeler,

The Association of Minnesota Public Educational Radio Stations (Ampers) represents sixteen small community radio stations throughout the state of Minnesota. **We are writing to ask the FCC to either reject the proposed rule to require all broadcast radio stations to post their public and political files on to the FCC's online database or exempt non-commercial educational stations (NCEs) from the rule.**

All Ampers stations are NCEs and are not affiliated with nor do they receive funding from Minnesota Public Radio (MPR) or American Public Media. The Ampers stations serve the underserved communities of Minnesota including rural, minority, and student communities. Four of the stations are licensed to or affiliated with Native American tribes. The Ampers stations have very small staffs with some only employing two to five employees. They serve a very important role in their communities and are able to do so with very limited resources.

The Ampers stations fully support transparency and the public's right to know and operate in a truly transparent manner. The Ampers stations always have and will continue to make the information in the public file as accessible as possible. That said, we have serious concerns that most of the stations do not have the employee resources or infrastructure in place to move the public file online. While we are firmly committed to public transparency, the passage of an online requirement would create a severe financial and staffing hardship for most of the Ampers stations.

It is our understanding that one of the biggest reasons behind the push to move the public file online is to give all citizens and organizations access to political spending information. Because all of the Ampers stations are NCEs, the stations cannot and do not accept funds from political candidates or organizations advocating on behalf of a candidate or political issue. **With that being the case, we respectfully ask that the FCC allow NCE stations to continue to maintain a physical public file rather than forcing them to make the file available online.**

In the event the FCC determines that all stations, including NCE stations, must post the public file on the internet, we would ask that the commission provide stations as much time as possible to make the transition. If that is the case, we would also ask that you allow the online file to replace the physical file as it would be redundant and require even more staff hours to maintain both.



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We realize that American Public Media Group and MPR are supporting the rule to require all radio stations to post their public and political files to the FCC's online database. While the Ampers stations agree with this idea in theory, Ampers stations unfortunately just don't have the financial and staffing resources that American Public Media Group and MPR have. American Public Media and MPR can voluntarily post their public file online. If or when an individual Ampers station grows to the point of having the resources to do so, it can do so voluntarily as well.

Our communities have tremendous trust in our stations. We will continue to proudly represent and serve these communities and do so in a very transparent manner. Ampers stations simply don't have the resources to post all of the information from their public files to the FCC's online database.

Respectfully submitted,

A handwritten signature in black ink, reading 'Joel A. Glaser' in a cursive script.

Joel A. Glaser
Chief Executive Officer
Association of Minnesota Public Educational Radio Stations
2175 Cool Stream Circle
Eagan, MN 55122